

Summary of December 9, 1999
Indiana Department of Environmental Management (IDEM) and
Clean Manufacturing Technology and Safe Materials Institute (CMTI)
Meeting with Metal Finishers and POTWs Participating in
Metal Finishing Strategic Goals Program

The meeting was called to order at 1:10 p.m. by facilitator Kathy Watson. The facilitator welcomed meeting participants and summarized the main meeting agenda items - national and regional updates; workgroup progress reports and updates to Indiana's SGP implementation plan; and presentation of a draft performance ladder.

OPENING REMARKS FROM IDEM

After introductions by those in attendance (**meeting roster attached**), IDEM Deputy Commissioner Tim Method provided opening remarks. Mr. Method reiterated IDEM's commitment to the Strategic Goals Program and recognized internal staff and meeting attendees for their efforts and commitment as well. Mr. Method also recognized the latest official SGP signees - the LaPorte Wastewater Treatment Plant, Ampcor II (LaPorte), Certified Metal Finishers (Muncie), and Indiana Automotive Fasteners (Greenfield).

NATIONAL/REGIONAL UPDATES

Robert McDowell, Surface Finishing Industry Council

1. Bob McDowell, national industry SGP spokesman, welcomed meeting attendees and noted that he was here about a year ago attending the first Indiana SGP stakeholder meeting. Mr. McDowell reported that Indiana is one of the leading states on development and implementation of the SGP along with Illinois (Chicago), California and Texas. He also indicated that Indiana is the leading state for companies submitting their performance worksheets.
2. After officially signing on to the SGP, metal finishers receive a "Welcome Aboard Kit" from the SFIC and are recognized during the American Electroplaters and Surface Finishers Society (AESF) Week in Orlando in January.
3. On the national level, industry leaders in Washington are trying to identify what the metal finishing industry needs to do to assist small metal finishing businesses achieve the national performance goals.
4. One new tool that is coming in February 2000 is a revised, simpler performance worksheet, as Part 4 of the previous worksheet is confusing. The plan is to test the worksheet, with revisions, for another year. Reductions in hazardous waste generated will now be emphasized to help determine progress towards achieving the 98% metals utilization goal.
5. Jerry Phillips was recognized for setting up Indiana's SGP trade display at today's meeting and other recent public events and trade shows.
6. The SGP is now becoming more of a regionalized effort, to make it easier for states to become involved and institutionalize their local programs in lieu of control by the Environmental Protection Agency (EPA). We should see more control at the local level over the next year.
7. Scott Dosick has left EPA Headquarters to return to his home state of California. His replacement as national SGP program coordinator is Mindy Gampel.
8. The metal finishing industry has established an industry board of directors, with a representative from each active local program. Mark Sutton of H.H. Sumco is Indiana's industry representative, and has been attending the national meetings and participating in conference calls. The group is sharing information on problems experienced with program implementation and any barriers encountered in

making progress towards the goals.

9. Mr. McDowell noted that he was impressed with IDEM's SGP website and the new SGP newsletter produced by the Clean Manufacturing Technology and Safe Materials Institute (CMTI). He commented that the newsletter is an excellent recruitment tool.
10. Mr. McDowell noted he is not aware of where Indiana stands on the involvement of non-governmental organizations (NGOs). Note: both IDEM and CMTI have been in contact with environmental group representatives and made brief presentations about the SGP; and representatives are included on IDEM's SGP mailing list.
11. The national SGP website, www.strategicgoals.org, now provides a "SGP toolbox" which includes implementation plans, P2 ideas, etc. from other states participating in the program. Indiana has offered our key documents for inclusion in the national toolbox.

Matt Gluckman, EPA Region 5 SGP Lead

1. Matt reported that the public comment period on revisions to the general pretreatment rules proposed in July 1999 was extended from 60 to 120 days. EPA is now beginning to review and evaluate numerous comments received on the proposed rule and expects to finalize revisions to the rule in about one year.
2. As for the proposed rule to extend the 90 day storage rule to 180 days for waste to be recycled, EPA is pushing to finalize the rule in early 2000.
3. EPA is also evaluating the study of F006 constituents (e.g., cadmium) versus government specifications for hazardous waste. There's a possibility of some future regulatory revisions to be recommended by the national workgroup evaluating the study results.
4. Region 5 has one of the most active programs in the country. A national implementation oversight steering committee has been formed and David Ullrich of EPA Region 5 and Claudio Ternieden of IDEM are members of the national steering committee. There is commitment at EPA HQ to support the steering committee. One issue to be addressed will be discussions among the states on the issue of State reciprocity for sending metal finishing sludges out-of-state for recycling.
5. Matt indicated that Indiana's efforts in implementing the SGP are vital in showing that the national program can also be successful.
6. EPA Region 5 hopes to receive a new intern by January 2000 to assist in providing program support.

Claudio Ternieden, IDEM

1. Claudio reported that the national SGP steering committee will be meeting every three to four months. An executive committee was formed to provide direction to the subcommittees on behalf of the full steering committee. The formation of the steering committee will provide the means for more rapid response to questions that arise during program implementation and development of a strategy to market the SGP.
2. There needs to be a better national package for encouraging other states and entities to join the program.
3. Some companies are beginning to see an economic benefit by participating, but the data is not broadly available as of yet. The steering group hopes to take this information and appropriately package it; and also learn what strategies have worked, and those that have not.
4. The vision for the marketing package is two-fold, with a package geared to financial and insurance providers; and the second aimed at POTW and job shop operators to take to their management.
5. The steering committee is currently developing a marketing outline and will be conducting several conference calls in the next two weeks.
6. Claudio noted problems with the collection of performance information, although Indiana is ahead of the rest of the country on the percentage of facilities submitting the required performance worksheets. The national group is searching for ways to encourage continued receipt of these worksheets with

properly calculated performance information. The steering committee is also focusing on particular reporting refinements for some of the goals; since completion of the performance worksheets was not anticipated to result in the creation of additional work or monitoring other than what is currently required by existing regulations.

7. There is also a national push to tailor the SGP towards the larger “captive” operations and also to determine how environmental management systems might factor into the program.
8. The need to maintain flexibility at the local level is essential, therefore regionalization of the program at the state/local level is very important.
9. Claudio reported that IDEM provided comments on the proposed federal pretreatment streamlining rule. Sue Claussen asked Mr. Gluckman if he knew whether the final regulation would have major or minor changes compared to the proposed regulation. Matt responded that he had not yet seen the public comments, but felt there would be some changes from the proposed version. However, he does not feel the regulation will need to be re-public noticed prior to final approval.

Carol McDowell expressed dismay on receiving a letter from EPA Region 5 EPCRA regarding Title III reporting and questioned why metal finishers appear to be singled out on this initiative. Matt Gluckman responded that he did not have the information to respond. Bob McDowell commented that when questions and concerns such as this arise, metal finishing facilities should advise Mark Sutton.

Matt Gluckman noted that Bob Tolpa, formerly SGP co-lead for EPA Region 5, now works for the Office of Enforcement and Compliance Assurance (OECA) at EPA Headquarters. There are discussions at the national level to merge/coordinate OECA metal finishing initiatives with the SGP in the year 2000.

Claudio noted the good communication IDEM has with OECA staff at EPA Region 5 and joint agency worksharing through the Environmental Performance Partnership Agreement (EnPPA). He also reported that Indiana is moving forward to obtain pretreatment program delegation from EPA Region 5.

INDIVIDUAL WORKGROUP REPORTS

RCRA Issues Workgroup

Bob McDowell asked whether the RCRA Workgroup had been working with the national study group on F006 issues. Mark Sutton responded that Indiana’s RCRA workgroup has essentially been working separately, but Dave Berrey of IDEM had been participating in a large national group discussing RCRA barriers to recycling. Gary Romesser has also been in contact with Janice Bryant and Kristina Meson of the national study group on various RCRA-related issues.

Workgroup co-leads Gary Romesser of IDEM-RCRA and Mark Sutton of H.H. Sumco presented an update on major items under review by the RCRA workgroup as follows:

1. **Reclaimer/Recycler List** - Gary asked the metal finishing companies present to assist Mark Stoddard by providing the names of the metal reclaimers they use so Mark can compile a mass listing of available metal reclaimers. Gary also stated that he/Mark are having some trouble locating information on reclaimers and recyclers and asked whether it would be worthwhile to metal finishers for Gary/Mark to pursue this project and continue to make these efforts. No response was provided by meeting attendees.
2. **F006** - Gary reported that Nate Nemani had provided information regarding his research on the RCRA F006 180-day accumulation time Proposed Rule. Revisions to this proposed rule for reclaimed waste include:
 - (a) allow up to 20,000 kilograms (equivalent to a typical truckload) accumulation at any one time,
 - (b) allow the 180-day accumulation time for generators recycling at their site as well as at off-site recycling facilities; and
 - (c) add applicability of the rule to intermediate processors as well as the smelters/end processors.

3. **Treatment Options** - RCRA workgroup is acquiring information on treatment options and wastestream segregation/handling of hazardous wastes. In some cases, these examples have resulted in generated sludges more amenable for reclamation.
Metal Plate Polishing neutralizes an acidic spent cleaner (D002) to render it non-hazardous; then, after testing to verify that it meets discharge limits, sends it to the Ft. Wayne POTW.
H.H. Sumco is segregating wastestreams to increase the copper content from their tin sludge. The workgroup encourages more submittals by SGP participants.
4. **Model Draft Format for Variance Request** - Mark Sutton reported that Sumco hopes to submit their request for a solid waste variance to IDEM sometime after the holidays.
5. **State to State Reciprocity** - workgroup is preparing an issue paper and proposal to EPA regarding potential barriers encountered when solid waste variances granted by one state may not be recognized in another state. The proposal to EPA may include a provision for exclusion from solid waste based on metal content. **The workgroup anticipates presenting a complete draft proposal for comments and discussion at the next full SGP stakeholder meeting.**

POTW Workgroup

1. Claudio Ternieden reported that although the workgroup has not had a formal meeting since August, workgroup participants have been communicating and working through the IWPCA pretreatment committee.
In October 1999, the City of LaPorte Wastewater Treatment Facility signed on to the SGP. The workgroup continues to focus on recruiting additional POTWs and metal finishers to officially sign on. An SGP recruitment session is planned for February 9 in northern Indiana and CMTI will also be participating. Claudio will also be contacting Indianapolis and other municipalities for similar sessions with their local metal finishers. Sessions may also be scheduled in central and southern Indiana as well.
2. The workgroup also plans to focus on identifying incentives and the needs of POTWs who have already signed on.
3. State incentives to POTWs - Claudio reported that the Office of Water Management at IDEM is reorganizing the Permit Compliance Branch to create a pretreatment section. Bill Blue is currently working on revisions to the current pretreatment rules with February 1 as the goal for second notice in the rulemaking process. The goal for submission of the pretreatment program delegation request to EPA Region 5 is June 2000.
4. OWM will also serve as the lead for identifying SGP incentives to be provided in state-issued industrial pretreatment permits.
5. **As an agenda item for the next meeting**, IDEM will provide a summary of the draft state pretreatment rule and key issues.

Technical and Financial Assistance

Shayla Barrett of CMTI provided the following updates:

1. Shayla reported that there are numerous loan programs available in Indiana. Dr. Corson of CMTI will work with metal finishers having trouble getting conventional loans to match them up with appropriate loans/programs.
2. In the past CMTI has obtained Strategic Development Fund (SDF) matching loans in the wood furniture and reinforced fiberglass sectors. CMTI has made a similar request for SGP metal finishers and a meeting with SDF representatives on December 2 sounded promising.
3. Shayla noted that Indiana metal finishers have completed their baseline and annual performance worksheets without CMTI's help and have done a great job! He reiterated CMTI's offer to continue to provide free, confidential technical and technology transfer assistance to interested metal finishers.

Some participants have already contacted CMTI for pollution prevention and pollution reduction opportunities.

4. After the first of the year, Shayla/CMTI will be happy to work with SGP metal finishers to assist in determining where they currently stand in their progress towards achieving each of the SGP performance goals and what they need to work on.
5. Shayla also presented CMTI's written input regarding sign-on incentives to be provided by CMTI. This information will be added to Indiana's SGP implementation plan routinely updated by IDEM following each full SGP stakeholder meeting. CMTI's role in the SGP for metal finishers is to:
 - recruit Indiana metal finishers for the SGP.
 - serve as initial contact for Indiana metal finishers who have signed on to the SGP. CMTI will welcome the metal finisher to the SGP and offer aid in completing the forms required for baseline information and additional years' information in order to determine the metal finisher's progress towards the SGP goals.
 - perform an on-site, confidential multimedia environmental assessment to determine whether or not the metal finisher is in regulatory compliance. Aid the metal finisher in becoming compliant if they are not.
 - perform an on-site, confidential pollution prevention opportunity assessment to determine if opportunities exist for the metal finisher to save money, reduce toxic emissions, and also progress towards the SGP goals, and
 - provide technical assistance towards the metal finisher achieving the SGP goals.

Recruitment

1. Jerry Phillips of Finishing Concepts reported that the workgroup met immediately following the Partners for P2 conference held in Greenwood on September 22, 1999. Most of the meeting was spent determining the workgroup's mission, strategy and goals. It was determined that the initial focus of the group would be to focus on three points:
 - What do we want to say?
 - How do we want to say it?
 - Who do we want to say it to?
2. Look for "low hanging fruit" (e.g., companies that can make a quick decision, ISO 14000, captive shops).
3. SGP has been promoted at various external forums (Partners for P2 conference, IWPCA annual conference) with the display board made up with the SGP promotional posters, poster with signees names, and IDEM's promotional brochure.
4. Workgroup hopes to make direct phone calls to approximately 350 companies on the comprehensive metal finisher mailing list (i.e, job shops and captive operations subject to either 40 CFR 413 or 433 effluent guidelines).
5. POTWs - spread by word of mouth.
6. Fax/e-mail - have not been utilized at this point.
7. Some work has been done with industry groups and trade associations.
8. Brochures/newsletters - have been developed by IDEM and CMTI.
9. Ideas needed for future CMTI SGP newsletters -
 - Bob McDowell suggested including a copy of Indiana's SGP implementation plan in the next newsletter.
 - Claudio suggested including a copy of the national package on cost-saving success stories
 - Shayla provided an open invitation to submit additional ideas for inclusion in future newsletters.

Recognition

Debbie Dubenetzky provided the following report on behalf of the recognition workgroup:

1. Workgroup has completed all assigned tasks to date including:
 - issuance of an IDEM press release in August regarding the program and participants,
 - worked with CMTI to compile a mailing list of approximately 350 Indiana metal finishers. These facilities were added to the mailing list to receive the *Indiana Environment and Materials Exchange* publication
 - SGP article and photo published in November/December issue of the *Indiana Environment*
 - development of SGP promotional and recognition posters and brochure used at Partners for P2 Conference in September and IWPCA annual conference in November
 - development of SGP page at IDEM's website with links to national and local sites
 - development of 1st draft on an Indiana performance ladder proposal/5-Star Environmental Recognition Program.
2. Since "recognition" is now and up and running process, the group recommends that the focus of this group should evolve into a Performance Ladder/5-Star/Incentives Workgroup to focus on the continued development of the state/local performance ladder.

PRESENTATION OF INDIANA PERFORMANCE LADDER DRAFT

Debbie Dubenetzky walked through the performance ladder/5-Star proposal explaining that the current Indiana draft is based on the four (4) key elements offered in the performance ladder model included in the June 1999 national "How-To Guide" as follows:

- **performance levels** (e.g., steps or stars) Indiana will use the 5-Star Environmental Recognition Program approach.
- **achievement marks** (e.g., minimum requirements to qualify for each performance star; tied to SGP goals) Draft uses the simpler cumulative approach (i.e., achievement of 2-3 of the 7 SGP performance goals qualifies metal finisher as a "3-Star Metal Finisher) in lieu of the percentage approach.
- **verification** - one state review committee to verify a facility has reached a SGP goal.
- **benefits** - tied to each step/star. Assistance needed from each of the local POTW signees to identify local incentives/benefits to be made available at each step/star.

Mark Sutton asked how ISO 14001 certification might fit in to the performance ladder. Claudio responded that the national steering committee will be addressing the role of environmental management systems (EMS) such as ISO 14001 and how they might factor into the national performance ladder model. There is a definite push to recognize and incorporate EMSs into the SGP. Matt Gluckman commented that Michigan is working on their performance ladder as well using "bronze, silver and gold" performance levels. At the silver or gold level, an EMS is required.

Ted Heemstra asked for how long a period the performance stars are awarded. Cheri Storms responded that in some of IDEM's other 5-Star programs, "stars" last for up to two years before the applicant has to reapply. However the current metal finisher draft is based on one year to coincide with submission of the annual SGP performance worksheets. Bob McDowell added that it will be up to the local verification workgroup to decide. Claudio asked whether the national steering committee should develop general criteria for the states/local programs to follow stressing national consistency, yet providing local flexibility. Bill Blue commented that Indiana can be a leader on developing such criteria through our state program.

Volunteers were asked to contact Debbie or Cheri if interested in serving on the workgroup. Mark Sutton volunteered to participate.

Al Mayo noted the need for an environmental representative on the verification committee. Tim Method responded that IDEM has talked to environmental groups about the SGP. Although watchful on potential

benefits to be awarded, they are supportive of the program.

NEXT STEPS

Next steps offered by Kathy Watson and agreed to by meeting participants:

1. IDEM to update the Indiana SGP implementation plan document. **A copy of the updated implementation plan draft is attached.**
2. Workgroups should continue development of Indiana's performance ladder/5 Star environmental recognition proposal over the coming weeks.
3. Next full stakeholder group meeting to be held on March 16 from 10:00 to noon Indianapolis time at Purdue University. Location to be announced. Specific agenda items to include any issues that arise in implementing the implementation plan and developing the performance ladder. Discussion can focus on strategies to overcome the implementation barriers encountered. Workgroup leads should keep Debbie Dubenetzky apprized of their activities and any problematic issues that arise.
Note: Next full stakeholder meeting to be held at Purdue University in the Stewart Center, Room 214A.

The facilitator adjourned the meeting at 3:15 p.m.

Attachments: Meeting Roster (please contact Debbie Dubenetzky/IDEM at (317) 233-5747 if you wish to be faxed a paper copy of the sign-in sheet)
Indiana SGP Implementation Plan for 1999-2000 - Revised 2/4/00